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2 Nevada State Bar No. 2137

3
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7 Attorneys for Defendant

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9   UNITED STATES DISTRICT COURT

                       DISTRICT OF NEVADA
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11
   RUSTY W. BESEAU,   )   Case No.: 2:14-cv-01952-GMN-GWF
12   )
              Plaintiff,   )   **UNOPPOSED MOTION FOR**
13   )   **EXTENSION OF TIME**
         vs.   )   **(FIRST REQUEST)**
14   )
   CAROLYN W. COLVIN,   )
15 Acting Commissioner of Social Security,)
)
16   Defendant.   )
)
17

18   Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")

19 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to

20 Affirm and Response to Plaintiff's Motion for Reversal, due on **June 26, 2015**, by **28 days**,

21 through and including **July 24, 2015**.

22   There is good cause for this extension because the case is being transferred to another

23 attorney in the Commissioner's office and needs additional time to complete the responsive

24 pleading. Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to

25 this motion, on June 24, 2015.

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1   Respectfully submitted this 25th day of June 2015.

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                                              DANIEL G. BOGDEN
3   United States Attorney

4   */s/ Asim H. Modi*
                                              ASIM H. MODI
5   Special Assistant United States Attorney

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7   OF COUNSEL:

8   DONNA L. CALVERT
    Regional Chief Counsel, Region IX

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                                              IT IS SO ORDERED:
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                                              GEORGE FOLEY, JR.
14   UNITED STATES MAGISTRATE JUDGE

                                              DATED: June 26, 2015
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CERTIFICATE OF SERVICE

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I, **Asim H. Modi**, certify that the following individual was served with a copy of the
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the date and
via the method of service identified below:

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CM/ECF:

5

Marc V. Kalagian, Esq.
6 Law Offices of Rohlfing & Kalagian, LLP
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7 Long Beach, California 90802
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8

9

Dated this 25th day of June 2015
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//s// *Asim H, Modi*
ASIM H. MODI
12 Special Assistant United States Attorney

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